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Attorney for Defendant  
TERRY LE CLAIR

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
  
Plaintiff,

v.

TERRY LE CLAIR,  
  
Defendant.

Case No.: 2:22-cr-00197-JAM

**STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE**

**STIPULATION**

Defendant Terry Le Clair, by and through his undersigned counsel, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate as follows:

1. By previous stipulation and order of the Court, the Status Conference in this matter was set for November 21, 2023. The parties now seek to vacate that date and request the matter be reset for January 23, 2024 at 9:00 AM. The defendant agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up to and through the January 23, 2024 date.
2. To date, defense counsel has received over 1000 pages of documents and 8 audio files. The government has represented that additional discovery, including numerous photographs, are available to view at its Roseville, California office, and

1 that its investigation is ongoing.

2 3. At this time, counsel for defendant requires additional time to conduct investigation  
3 and research related to the charges, review discovery for this matter, discuss  
4 potential resolutions, and to otherwise prepare for trial.

5 4. The parties stipulate that the failure to grant the above-requested continuance would  
6 deny defense counsel reasonable time necessary for effective preparation, taking  
7 into account the exercise of due diligence.

8 5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161,  
9 et seq., the parties agree and request that the time period from November 21, 2023,  
10 to January 23, 2024 inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A), B(iv)  
11 [Local Code T4] upon such finding by the Court that the ends of justice served by  
12 taking such action outweigh the best interest of the public and the defendant in a  
13 speedy trial.

14 IT IS SO STIPULATED.

15  
16 Dated: November 16, 2023

/s/ ETAN ZAITSU

17 ETAN ZAITSU  
18 Counsel for Defendant  
19 TERRY LE CLAIR

20  
21 Dated: November 16, 2023

PHILLIP A. TALBERT  
United States Attorney

22  
23 /s/ CHRISTINA MCCALL

24 CHRISTINA MCCALL  
25 Assistant United States Attorney  
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27  
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**ORDER**

IT IS SO ORDERED that the status conference currently scheduled for November 21, 2023 is hereby **CONTINUED** to **January 23, 2024, at 09:00 a.m.** It is further ordered that the time period between these dates is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO FOUND AND ORDERED.

Dated: November 16, 2023

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE